

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

XIANHUA ZHANG	:	
	:	
Plaintiff,	:	Case No. 07-555 (JJF)
	:	
V.	:	
	:	
ING DIRECT	:	
	:	
Defendant.	:	
	:	

**REPLY BRIEF IN SUPPORT OF DEFENDANT'S MOTION TO COMPEL PLAINTIFF
TO PROVIDE COMPLETE, NON-EVASIVE RESPONSES TO INTERROGATORIES 2,
3, 5, 16, 17, AND DOCUMENT REQUESTS 10, 11, 12, 17, 21, 22, AND 23**

Defendant ING Bank, fsb ("Defendant") submits this Reply Brief in further support of its Motion to Compel. Since Defendant filed its Motion to Compel on June 3, 2008, Plaintiff has produced a handful of documents, primarily "screen shots" of his personal email inbox and a tax document that reveals the amount of unemployment compensation Plaintiff received subsequent to the termination of his employment with Defendant. Plaintiff also confirms in his response to Defendant's Motion to Compel that he is limiting his damages claim to August 16, 2005 through November 28, 2005 because he obtained new employment on or about November 28, 2005. Plaintiff's production and confirmation of the limited nature of his damages claim have eliminated several issues, but several issues remain, including Plaintiff's refusal to provide documents responsive to Defendant's document requests 10 and 17 as well as Plaintiff's claim that "screen shots" of his email inbox satisfy his discovery obligations regarding Defendant's document request 11. Moreover, Plaintiff refuses to respond fully to several interrogatories and

document requests that seek nothing more than relevant information that is required to litigate this case.

ARGUMENT

A. Defendant Will Withdraw Document Request 10 In Its Entirety And Document Request 17 As To Post 11/28/2005 Economic Damages If Plaintiff Has Indeed Confirmed He Seeks Economic Damages From Only 8/16/2005 Through 11/28/2005.

Defendant's document request 10 seeks all documents related to the income Plaintiff received on or after August 16, 2005, the day his employment with Defendant ended. Document request 17 seeks all documents related to any damages Plaintiff claims he has suffered as a result of the conduct of Defendant. In response to these requests, Plaintiff has produced only one document that indicates the amount of unemployment compensation he received between August 16, 2005 and November 28, 2005. Plaintiff claims that he has no obligation to produce any further documents related to his income or damages after November 28, 2005 (the date he obtained new employment with CDI Corporation) because "Plaintiff only claims wage loss between 8/16/2005 and 11/28/2005." *See* Pl's Opp. Br. at 2. Subject to Plaintiff's confirmation that *his only economic damages claim* is back pay damages from August 16, 2005 to November 28, 2005, Defendant will withdraw document request 10 in its entirety and document request 17 only as to post November 28, 2005 economic damages. Otherwise, Plaintiff continues to be in default of his discovery obligations under the Federal Rules of Civil Procedure.

B. Plaintiff's "Screen Shots" Do Not Satisfy His Obligations Regarding Document Request 11.

Defendant's document request 11 seeks documents related to Plaintiff's job search efforts after August 16, 2005 when he separated from Defendant. The only documents Plaintiff has

produced regarding this request are “screen shots” of his email inbox. See Exh. A. These documents do not provide any information regarding where Plaintiff looked for work, what kind of jobs he sought, if any, whether he participated in any interviews or was offered any positions. In sum, these documents do nothing to aid Defendant in determining whether Plaintiff satisfied his duty to mitigate his damages.

Plaintiff goes on to claim that he has no other documents related to this request because the emails he received from employers where he allegedly applied for work “are also deleted long time ago to free space.” See Pl’s Opp. at 1. Plaintiff does not explain, however, how he was able to take “screen shots” of these allegedly deleted emails but is unable to open the emails and print them out. Defendant is concerned that Plaintiff has deleted the actual evidence of his mitigation efforts sometime after he provided his initial discovery responses.

C. Plaintiff Continues to Refuse To Respond Fully To Several Other Interrogatories And Document Requests.

Despite the passage of several months, countless entreaties from Defense counsel and Defendant’s Motion to Compel, Plaintiff continues to refuse to respond fully to Defendant’s interrogatories 2 and 3 (concerning Plaintiff’s mitigation efforts) or to provide documents responsive to Defendant’s document requests 12, 21, and 22 (concerning Plaintiff’s mitigation efforts, the documents Plaintiff provided to any governmental agency regarding this case, and the documents Plaintiff took with him and or retained from Defendant after his employment with Defendant concluded). As stated in Defendant’s Motion to Compel, these interrogatories and document requests seek relevant information and/or information reasonably likely to lead to the discovery of admissible evidence.

For the above reasons, and the reasons more fully stated in Defendant's initial Motion to Compel, Defendant respectfully requests that the Court grant its Motion to Compel.

Dated: June 30, 2008

/s/ David P. Primack

David P. Primack (I.D. No. 4449)
DRINKER BIDDLE & REATH LLP
1100 N. Market Street, Suite 1000
Wilmington, DE 19801-1254
(302) 467-4220

Attorneys for Defendant ING Bank, fsb

OF COUNSEL:

David J. Woolf (admitted *pro hac vice*)
Edward N. Yost (admitted *pro hac vice*)
DRINKER BIDDLE & REATH LLP
One Logan Square
18th & Cherry Streets
Philadelphia, PA 19103
(215) 988-2700

CERTIFICATE OF SERVICE

I, David P. Primack, hereby certify that, on this date, I caused a true and correct copy of the foregoing document to be served on the plaintiff by electronic and first-class U.S. mail, postage prepaid, at the following address:

Xianhua Zhang
212 Yorktown Court
Malvern, PA 19355

Dated: June 30, 2008

/s/ David P. Primack
David P. Primack

EXHIBIT A

(2037 unread) Yahoo! Mail, peterzhang9999 - Windows Internet Explorer

File Edit View Favorites Tools Help

☆ (2037 unread) Yahoo! Mail, peterzhang9999

YAHOO! MAIL peterzhang9999 Offline - Sign Out, My Account, Mail Classic

Check Mail New Search Mail Go

Home Sent 345 messages

Delete Reply Forward Move Print More Actions View

To Subject Sent Size

merle.shao@ngdirect.com book Thu, 8/25/05 2:23 PM 2KB

resaramone@ngdirect.com some issues Thu, 8/25/05 2:15 PM 2KB

steveck@designstrategy.c Re: Oracle designer/architect contract position in New Thu, 8/25/05 1:45 PM 3KB

Tim Boerner RE: Oracle DBA Opportunity Wed, 8/24/05 1:26 P 19KB

Tim Boerner Re: Oracle DBA Opportunity Wed, 8/24/05 1:06 P 8KB

Kenita1@aol.com Re: Inquiry about Dice Job Number XKRACLEDBAPA Tue, 8/23/05 8:42 AM 3KB

Vikas Re: Urgent Openings for Oracle DBAs in PA Tue, 8/23/05 8:30 AM 94KB

linus.meginty RE: Oracle DBA position available Mon, 8/22/05 3:59 P 45KB

linus.meginty RE: Oracle DBA position available Mon, 8/22/05 3:18 P 37KB

Peter DiNicola Re: Your Job Circle Listing Mon, 8/22/05 3:17 P 6KB

Ryan Ntchugh Re: Contact Info Mon, 8/22/05 3:16 P 90KB

Tom Altunay Re: Contact Info Mon, 8/22/05 3:15 P 92KB

rckely@kellythomas.net Re: job status Mon, 8/22/05 12:59 4KB

neonard@anexinet.com RE: JobCircle Applicant--Sr. DBA Sun, 8/21/05 3:53 P 40KB

Pam Stockli RE: Short term contract Sun, 8/21/05 3:46 P 92KB

neonard@anexinet.com RE: JobCircle Applicant--Sr. DBA Wed, 8/17/05 3:12 P 35KB

neonard@anexinet.com RE: JobCircle Applicant--Sr. DBA Wed, 8/17/05 2:29 PM 34KB

neonard@anexinet.com RE: JobCircle Applicant--Sr. DBA Wed, 8/17/05 2:29 PM 29KB

Re: Oracle DBA / PA Compact Header Full Message View

Peter Zhang <peterzhang9999@yahoo.com> To: Aditya <aditya@calamerica.com>

Re: rea05.doc (65KB)

Hi,

TODAY: WED, 8/23 - WED, 8/24 NO EVENTS THU, 8/25 + CapitalOne FRI, 8/26 - SAT, 8/27 NO EVENTS

Done

7:50 PM Wednesday 4/23/2008

Address: C:\Windows\Explorer http://us.mg1.mail.yahoo.com/dc/launch?rand=3e180me8hsd5 metlife.com/dental

(2037 unread) Yahoo! Mail, peterzhang9999 - Windows Internet Explorer

File Edit View Favorites Tools Help

☆ (2037 unread) Yahoo! Mail, peterzhang9999

YAHOO! MAIL peterzhang9999 Offline - Sign Out, My Account, Mail Classic

Check Mail New Search Mail Go

Home Sent 345 messages

Delete Reply Forward Move Print More Actions View

To Subject Sent Size

schmeier, richard RE: Oracle DBA Wed, 9/7/05 2:33 AM 5KB

key gupta Re: Re: Oracle DBA Opening Wed, 9/7/05 2:20 AM 5KB

wurst, jon Re: please send resume... SAP America Fri, 9/2/05 6:34 AM 12KB

Alex Kent Re: Oracle DBA contract in DE Mon, 8/29/05 6:21 PM 6KB

Marty Radnor Re: Current openings for DBAs in NJ and NY Mon, 8/29/05 6:19 P 8KB

Marty Radnor Re: your resume Mon, 8/29/05 6:17 P 89KB

Jagruti Shah Re: HotJobs submission for DE-2001, Oracle DBA Mon, 8/29/05 6:07 PM 27KB

Monica Solys Re: resume Mon, 8/29/05 5:47 PM 90KB

resaramone@ngdirect.com some issues Mon, 8/29/05 3:18 PM 2KB

lisawelli@yahoo.com Fwd: CONFIRMATION OF YOUR CLAIMS Sun, 8/28/05 12:39 P 3KB

michael reynolds Re: Fri, 8/26/05 2:15 PM 11KB

raghu Re: PreInterview Agreement & Candidate Assessment - Fri, 8/26/05 12:16 PM 96KB

raghu Re: Urgent Req: Oracle DBA (P/UX and NT) Fri, 8/26/05 9:40 AM 92KB

michael reynolds Re: Rate Confirmation Fri, 8/26/05 9:37 AM 112KB

rebecca dimmick Re: FW: QuinTech following up Fri, 8/26/05 8:36 AM 91KB

michael reynolds Re: MBNA Fri, 8/26/05 8:13 AM 108KB

merle.shao@ngdirect.com book Thu, 8/25/05 2:23 PM 2KB

resaramone@ngdirect.com some issues Thu, 8/25/05 2:19 PM 2KB

Re: Oracle DBA / PA Compact Header Full Message View

Peter Zhang <peterzhang9999@yahoo.com> To: Aditya <aditya@calamerica.com>

Re: rea05.doc (65KB)

Hi,

TODAY: WED, 8/23 - WED, 8/24 NO EVENTS THU, 8/25 + CapitalOne FRI, 8/26 - SAT, 8/27 NO EVENTS

Done

7:51 PM Wednesday 4/23/2008

Address: C:\Windows\Explorer http://us.mg1.mail.yahoo.com/dc/launch?rand=3e180me8hsd5 metlife.com/dental

(2037 unread) Yahoo! Mail, peterzhang9999 - Windows Internet Explorer

File Edit View Favorites Tools Help

☆ (2037 unread) Yahoo! Mail, peterzhang9999

YAHOO! MAIL peterzhang9999 Offline - Sign Out, My Account, Mail Classic

Check Mail New Search Mail Go

Home Sent 345 messages

Delete Reply Forward Move Print More Actions View

To Subject Sent Size

schmeier, richard RE: Oracle DBA Wed, 9/7/05 2:33 AM 5KB

key gupta Re: Re: Oracle DBA Opening Wed, 9/7/05 2:20 AM 5KB

wurst, jon Re: please send resume... SAP America Fri, 9/2/05 6:34 AM 12KB

Alex Kent Re: Oracle DBA contract in DE Mon, 8/29/05 6:21 PM 6KB

Marty Radnor Re: Current openings for DBAs in NJ and NY Mon, 8/29/05 6:19 P 8KB

Marty Radnor Re: your resume Mon, 8/29/05 6:17 P 89KB

Jagruti Shah Re: HotJobs submission for DE-2001, Oracle DBA Mon, 8/29/05 6:07 PM 27KB

Monica Solys Re: resume Mon, 8/29/05 5:47 PM 90KB

resaramone@ngdirect.com some issues Mon, 8/29/05 3:18 PM 2KB

lisawelli@yahoo.com Fwd: CONFIRMATION OF YOUR CLAIMS Sun, 8/28/05 12:39 P 3KB

michael reynolds Re: Fri, 8/26/05 2:15 PM 11KB

raghu Re: PreInterview Agreement & Candidate Assessment - Fri, 8/26/05 12:16 PM 96KB

raghu Re: Urgent Req: Oracle DBA (P/UX and NT) Fri, 8/26/05 9:40 AM 92KB

michael reynolds Re: Rate Confirmation Fri, 8/26/05 9:37 AM 112KB

rebecca dimmick Re: FW: QuinTech following up Fri, 8/26/05 8:36 AM 91KB

michael reynolds Re: MBNA Fri, 8/26/05 8:13 AM 108KB

merle.shao@ngdirect.com book Thu, 8/25/05 2:23 PM 2KB

resaramone@ngdirect.com some issues Thu, 8/25/05 2:19 PM 2KB

Re: Oracle DBA / PA Compact Header Full Message View

Peter Zhang <peterzhang9999@yahoo.com> To: Aditya <aditya@calamerica.com>

Re: rea05.doc (65KB)

Hi,

TODAY: WED, 8/23 - WED, 8/24 NO EVENTS THU, 8/25 + CapitalOne FRI, 8/26 - SAT, 8/27 NO EVENTS

Done

(2037 unread) Yahoo! Mail; peterzhang9999 - Windows Internet Explorer

File Edit View Favorites Tools Help

☆ (2037 unread) Yahoo! Mail; peterzhang9999

YAHOO! MAIL peterzhang9999 Offline Sign Out My Account Mail Classic

Check Mail New Search Mail... Go

Home Sent 845 messages

Delete Reply Forward Move Print More Actions New

To Subject Sent Size

Get DISH for less than cable

Inbox (2037) Drafts (124) Sent Spam (5) Trash (61) Contacts Calendar Notepad All Feeds My Folders

Empty Add Add Add

Re: Oracle DBA / PA Peter Zhang <peterzhang9999@yahoo.com> To: Aditya <aditya@catamerica.com> From: <aditya@catamerica.com> Date: 4/23/2008 10:52:00 AM

Hi,

Today: FRI, 4/23 - WED, 5/14 No events | THU, 5/15 + CapitalOne | FRI, 5/16 - SAT, 5/17 No events

Done

Windows Internet Explorer

File Edit View Favorites Tools Help

☆ (2037 unread) Yahoo! Mail; peterzhang9999

YAHOO! MAIL peterzhang9999 Offline Sign Out My Account Mail Classic

Check Mail New Search Mail... Go

Home Sent 845 messages

Delete Reply Forward Move Print More Actions New

To Subject Sent Size

Get DISH for less than cable

Inbox (2037) Drafts (124) Sent Spam (5) Trash (61) Contacts Calendar Notepad All Feeds My Folders

Empty Add Add Add

Re: Oracle DBA / PA Peter Zhang <peterzhang9999@yahoo.com> To: Aditya <aditya@catamerica.com> From: <aditya@catamerica.com> Date: 4/23/2008 10:52:00 AM

Hi,

Today: FRI, 4/23 - WED, 5/14 No events | THU, 5/15 + CapitalOne | FRI, 5/16 - SAT, 5/17 No events

Done

Windows Internet Explorer

(2037 unread) Yahoo! Mail peterzhang9999 Windows Internet Explorer

File Edit View Favorites Tools Help

☆ (2037 unread) Yahoo! Mail peterzhang9999

YAHOO! MAIL peterzhang9999 Offline Sign Out, My Account, Mail Classic

Check Mail New Search Mail... Go

Get DISH for less than cable

Inbox (2037) Drafts (134) Sent (5) Spam (5) Trash (61) Contacts Calendar Notepad All Feeds My Folders

Get full-length TV shows now

AT&T High Speed Internet \$19.95

Unlimited calls! just \$24.99/m

Re: Oracle DBA / PA Peter Zhang <peterzhang9999@yahoo.com> To: Aditya <Aditya@catamerica.com> From: peterzhang9999@yahoo.com (667)

Hi,

Today: WED, 4/23 - WED, 5/14 No events | THU, 5/15 - CapitalOne | FRI, 5/16 - SAT, 5/17 No events

Done Internet 100% 7:53 PM Wednesday 4/23/2008

(2037 unread) Yahoo! Mail peterzhang9999 Windows Internet Explorer

File Edit View Favorites Tools Help

☆ (2037 unread) Yahoo! Mail peterzhang9999

YAHOO! MAIL peterzhang9999 Offline Sign Out, My Account, Mail Classic

Check Mail New Search Mail... Go

Get DISH for less than cable

Inbox (2037) Drafts (134) Sent (5) Spam (5) Trash (61) Contacts Calendar Notepad All Feeds My Folders

Get full-length TV shows now

AT&T High Speed Internet \$19.95

Unlimited calls! just \$24.99/m

Re: Oracle DBA / PA Peter Zhang <peterzhang9999@yahoo.com> To: Aditya <Aditya@catamerica.com> From: peterzhang9999@yahoo.com (667)

Hi,

Today: WED, 4/23 - WED, 5/14 No events | THU, 5/15 - CapitalOne | FRI, 5/16 - SAT, 5/17 No events

Done Internet 100% 7:54 PM Wednesday 4/23/2008

(2037 unread) Yahoo! Mail, peterzhang9999 - Windows Internet Explorer

File Edit View Favorites Tools Help

(2037 unread) Yahoo! Mail, peterzhang9999

YAHOO! MAIL peterzhang9999 Offline Sign Out, My Account, Mail Classic

Home Sent 345 messages

Deleted Reply Forward Move Print More Actions View

To Subject Sent Size

Sandy Re: Job Description Wed, 10/19/05 10:28 A 9KB

KPrice@dsccorp.com Re: Ken Price - Distributed Systems Services Wed, 10/19/05 10:1A 4KB

Dechuk, Michael RE: Interview with Elecma CTO Wed, 10/19/05 9:51 AM 6KB

Navin Gunu RE: Inquiry about Dice Job Number ODBAR Wed, 10/19/05 9:30 AM 23KB

Emily Blester Re: Brooksource Tue, 10/18/05 4:38 PM 9KB

Josh Curry RE: Oracle DBA opportunity Tue, 10/18/05 2:28 PM 3KB

Winter, Stephenie RE: HI Peter! Tue, 10/18/05 10:47 AM 4KB

Josh Curry RE: Oracle DBA opportunity Tue, 10/18/05 9:35 A 15KB

Carolyn Dougherty, CPC RE: sungsard news Mon, 10/17/05 5:55 PM 3KB

Josh Curry Re: Oracle DBA opportunity Mon, 10/17/05 5:53 8KB

satyendu.raik@mess-pg.com Re: Urgent Opportunity for Oracle DBA Professional in PA. Mon, 10/17/05 10:03 AM 90KB

Norm Bauer Re: WORD RESUME AND EXPLANATION Fri, 10/14/05 2:10 PM 97KB

Vince RE: Further to our discussion Thu, 10/13/05 10:57 189KB

McClure, Phil (547) RE: Re new Openings Thu, 10/13/05 10:05 7KB

Amoroso, Jayson RE: CareerBuilder Job Application Tue, 10/11/05 5:22 69KB

Adam Rosenberg RE: Interview Tue, 10/11/05 2:01 17KB

craig@jotel.com Re: 3 New positions in SE PA Tue, 10/11/05 1:54 7KB

arjun@diverselynx.com Re: Opportunity with Direct Client requirements [Corp] Tue, 10/11/05 1:40 121KB

See full-length TV shows now.

AT&T High Speed Internet \$19.95

Unlimited calls just \$24.99/m

Re: Oracle DBA / PA Peter Zhang <peterzhang9999@yahoo.com> To: Aditya <Aditya@calamerica.com>

Re: results.doc (65KB)

Hi,

Today: WED, 4/23 - WED, 5/14 No events | THU, 5/15 - CapitalOne | FRI, 5/16 - SAT, 5/17 No events

Internet 100% 7:55 PM Wednesday 4/23/2008

(2037 unread) Yahoo! Mail, peterzhang9999 - Windows Internet Explorer

File Edit View Favorites Tools Help

(2037 unread) Yahoo! Mail, peterzhang9999

YAHOO! MAIL peterzhang9999 Offline Sign Out, My Account, Mail Classic

Home Sent 284 messages

Deleted Reply Forward Move Print More Actions View

To Subject Sent Size

michael@mlabccc.com Re: Contact Info for J&J Possible Opportunity Thu, 10/20/05 5:32 7KB

Colleen Svitala Re: Opportunity with traffic.com Thu, 10/20/05 5:17 91KB

Charles E. O'Kane RE: Inquiry about Dice Job Number COH002 Thu, 10/20/05 5:16 1 23KB

Winter, Stephenie RE: HI Peter! Thu, 10/20/05 5:14 1 24KB

Bush, Bill RE: Oracle DBA Dream Team Thu, 10/20/05 10:26 AM 38KB

koundsinya@yjil.com Re: Urgent need for Oracle DBA at Herndon,VA Thu, 10/20/05 10:09 AM 4KB

Bush, Bill RE: Oracle DBA Dream Team Thu, 10/20/05 10:05 AM 124KB

Bill Bush RE: Oracle DBA Dream Team Thu, 10/20/05 9:35 33KB

Re: Oracle DBA Dream Team Thu, 10/20/05 9:20 17KB

koundsinya@vjl.com Re: Urgent need for Oracle DBA at Herndon,VA Thu, 10/20/05 9:16 9KB

Flataçan, Lisa Re: PW: Andesa position - Oracle DBA Wed, 10/19/05 12:12 PM 14KB

John Clark Re: Thanks for taking my call! Wed, 10/19/05 11:35 AM 120KB

tmsjasic@relevantz.com Re: Dev Sys Engineer position Wed, 10/19/05 11:30 AM 3KB

Sandy Re: Job Description Wed, 10/19/05 10:28 AM 9KB

KPrice@dsccorp.com Re: Ken Price - Distributed Systems Services Wed, 10/19/05 10:01 AM 4KB

Dechuk, Michael RE: Interview with Elecma CTO Wed, 10/19/05 9:51 AM 6KB

Navin Gunu RE: Inquiry about Dice Job Number ODBAR Wed, 10/19/05 9:30 AM 23KB

Emily Blester Re: Brooksource Tue, 10/18/05 5:38 PM 9KB

Re: Oracle DBA / PA Peter Zhang <peterzhang9999@yahoo.com> To: Aditya <Aditya@calamerica.com>

Re: results.doc (65KB)

Hi,

Today: WED, 4/23 - WED, 5/14 No events | THU, 5/15 - CapitalOne | FRI, 5/16 - SAT, 5/17 No events

Internet 100% 7:55 PM Wednesday 4/23/2008

(2037 unread) Yahoo! Mail: peterzhang9999 - Windows Internet Explorer

File Edit View Favorites Tools Help

☆ (2037 unread) Yahoo! Mail: peterzhang9999

YAHOO! MAIL peterzhang9999 Offline Sign Out, My Account, Mail Classic

Check Mail New Search Mail Go

Deleted Reply Forward Move Print More Actions View Sent Size

0 To Subject

Desar, Julie I Re: job description Wed, 10/26/05 8:58 AM 13KB

Alex Babitsky RE: Request for Expert Directory Tue, 10/25/05 3:20 PM 3KB

Kevin Brown RE: Database Analyst Tue, 10/25/05 1:41 PM 8KB

paulk@magna-systems.o RE: REG: POSITION OPENING FOR ORACLE DBA IN PHILADELPHIA Tue, 10/25/05 1:29 PM 24KB

Winter, Stephanie RE: HI Peter! I have another Oracle DBA position for yo Tue, 10/25/05 1:25 PM 34KB

ambnish@cyberkorp.com RE: Inquiry about Dice Job Number DCORDBA Tue, 10/25/05 9:04 AM 26KB

Deepak S R Re: Excellent Opening - Oracle DBA Mon, 10/24/05 5:46 PM 24KB

Kevin Brown Re: Database Analyst Mon, 10/24/05 2:46 PM 4KB

Tony.Bruno@itstaffinc.com Re: #05-00256 - Oracle 9i DBA: Performance Testing - C Mon, 10/24/05 2:40 PM 14KB

Hoyme, Nancy Re: DBA Position - Amtrak (Philadelphia, PA) Mon, 10/24/05 1:47 PM 128KB

Petrella, Barbara Re: Possible Opportunity with CIBER, Inc. Mon, 10/24/05 1:25 PM 98KB

Balak, Kristine RE: Opportunity in PA Mon, 10/24/05 12:07 PM 9KB

Ballak, Kristine RE: Opportunity in PA Mon, 10/24/05 11:51 AM 6KB

Balak, Kristine Re: Opportunity in PA Mon, 10/24/05 11:47 AM 3KB

Aditya Re: Oracle DBA / PA Fri, 10/21/05 10:22 AM 34KB

michaelSma@scic.com Re: Contact Info for JDS Possible Opportunity Fri, 10/21/05 9:30 AM 1KB

michael@matrixce.com Re: Contact Info for JDS Possible Opportunity Thu, 10/20/05 5:32 PM 7KB

Colleen Switala Re: Opportunity with traffic.com Thu, 10/20/05 5:17 PM 91KB

Re: Oracle DBA / PA

Peter Zhang <peterzhang9999@yahoo.com> View To: Aditya <aditya@matrixce.com>

Re:015.doc (8KB)

Hi,

Internet 100% 7:55 PM Wednesday 3/23/2008

Done

Address: S Windows Explorer jobApp.doc - Microsoft Word

(2037 unread) Yahoo! Mail: peterzhang9999 - Windows Internet Explorer

File Edit View Favorites Tools Help

☆ (2037 unread) Yahoo! Mail: peterzhang9999

YAHOO! MAIL peterzhang9999 Offline Sign Out, My Account, Mail Classic

Check Mail New Search Mail Go

Deleted Reply Forward Move Print More Actions View Sent Size

0 To Subject

DVW@infotechpa.com RE: As per our telecom for Position in Harrisburg,PA - O Fri, 10/28/05 10:40 AM 51KB

DVW@infotechpa.com RE: As per our telecom for Position in Harrisburg,PA - O Fri, 10/28/05 9:17 AM 121KB

James Oliver Re: Fox Fox res Fri, 10/28/05 9:03 AM 12KB

Desar, Julie I RE: references Fri, 10/28/05 8:49 AM 12KB

Sam Matreja RE: Database Administrator (DBA) - Senior - C. Jersey - 1 Yr Con Thu, 10/27/05 12:01 PM 95KB

Desar, Julie I RE: job description Wed, 10/26/05 2:47 PM 36KB

Joe Gould RE: Peter, would these Oracle Apps DBA Assignment in PA Inter Wed, 10/26/05 2:12 PM 4KB

Desar, Julie I RE: job description Wed, 10/26/05 11:13 AM 29KB

Desar, Julie I RE: job description Wed, 10/26/05 11:08 AM 23KB

senbi RE: Inquiry about Dice Job Number ORADBA - client name Farap Wed, 10/26/05 9:04 AM 29KB

Timothy.Maisick RE: DBA position Wed, 10/26/05 9:04 AM 23KB

Desar, Julie I RE: job description Wed, 10/26/05 8:58 AM 12KB

Kevin Brown RE: Database Analyst Tue, 10/25/05 1:41 PM 8KB

paulk@magna-systems.o RE: REG: POSITION OPENING FOR ORACLE DBA IN PHILADELPHIA Tue, 10/25/05 1:29 PM 24KB

Winter, Stephanie RE: HI Peter! I have another Oracle DBA position for yo Tue, 10/25/05 9:04 AM 26KB

ambnish@cyberkorp.com RE: Inquiry about Dice Job Number DCORDBA Tue, 10/25/05 9:04 AM 26KB

Deepak S R Re: Excellent Opening - Oracle DBA Mon, 10/24/05 5:46 PM 24KB

Kevin Brown Re: Database Analyst Mon, 10/24/05 2:43 PM 4KB

Re: DBA position

Peter Zhang <peterzhang9999@yahoo.com> View To: Timothy.Maisick <tmaisick@relevant.com>

Re:015.doc (8KB)

Hi Tim,

Internet 100% 7:55 PM Wednesday 3/23/2008

Address: S Windows Explorer jobApp.doc - Microsoft Word

(2037 unread) Yahoo! Mail; peterzhang9999 - Windows Internet Explorer

File Edit View Favorites Tools Help

☆ * (2037 unread) Yahoo! Mail; peterzhang9999

YAHOO! MAIL peterzhang9999 Offline Sign Out My Account Mail Classic

Check Mail New Search Mail Go

Big packages Low DISH prices

Inbox (2037) Drafts (104) Sent (5) Spam (5) Trash (51) Empty Add Contacts Calendar Notepad All Feeds Add My Folders Add

Re: DBA position

Peter Zhang <peterzhang9999@yahoo.com> To: Timothy Matheick <tmatheick@relevant.com>

re:job.doc (6KB)

Hi Tim,

Compact Header Full Message View

Today: WED, 4/23 - WED, 5/14 No events THU, 5/15 CapitalOne FRI, 5/16 - SAT, 5/17 No events

Address: S Windows Explorer http://us.mg1.mail.yahoo.com/dc/launch?rand=3e1d0me8hds metlife.com/dental

(2037 unread) Yahoo! Mail; peterzhang9999 - Windows Internet Explorer

File Edit View Favorites Tools Help

☆ * (2037 unread) Yahoo! Mail; peterzhang9999

YAHOO! MAIL peterzhang9999 Offline Sign Out My Account Mail Classic

Check Mail New Search Mail Go

Big packages Low DISH prices

Inbox (2037) Drafts (104) Sent (5) Spam (5) Trash (51) Empty Add Contacts Calendar Notepad All Feeds Add My Folders Add

Re: DBA position

Peter Zhang <peterzhang9999@yahoo.com> To: Timothy Matheick <tmatheick@relevant.com>

re:job.doc (6KB)

Hi Tim,

Compact Header Full Message View

Today: WED, 4/23 - WED, 5/14 No events THU, 5/15 CapitalOne FRI, 5/16 - SAT, 5/17 No events

Address: S Windows Explorer http://us.mg1.mail.yahoo.com/dc/launch?rand=3e1d0me8hds metlife.com/dental

(2037 unread) Yahoo! Mail, peterzhang9999 - Windows Internet Explorer

File Edit View Favorites Tools Help

☆ (2037 unread) Yahoo! Mail, peterzhang9999

YAHOO! MAIL peterzhang9999 Offline Sign Out, My Account, Mail Classic

Check Mail New Search Mail... Go

Big packages Lovi DISH prices

Inbox (2037) Drafts (124) Sent (5) Spam (5) Empty Trash (51) Empty

Contacts Calendar Notes Add All Feeds Add My Folders Add

Re: Oracle DBA (hello again)

Schmeiss, Richard RE: Oracle DBA (hello again)

Dacar, Julie RE: fannie mae personal interview

Winter, Stephanie RE: HI Peter!

willian_befferz@fanniemae.ct Thanks

Rashmi Bali Re: ORACLE DBA (DE)

John Clark Re: Project in Rochester, NY...are you interested?

Dacar, Julie RE: fannie mae personal interview

Dacar, Julie RE: fannie mae personal interview

Winter, Stephanie RE: HI Peter!

Winter, Stephanie RE: HI Peter!

Lisa RE: Career Opportunity

Wayne Re: Oracle DBA real time replication

Joe Trainor Re: Fwd: YOUR RESUME CENDANT POSITION

Perry Dev RE: Inquiry about Dice Job Number b123

Beth Ann Koch RE: ORACLE DBA

Sam Matreja Re: Database Administrator (DBA) - Senior - C.Jersey - Mon, 10/31/05 7:59

Thu, 11/3/05 10:17 AM 6KB

Thu, 11/3/05 10:08 AM 4KB

Thu, 11/3/05 10:03 AM 2KB

Thu, 11/3/05 9:55 AM 52KB

Thu, 11/3/05 9:45 AM 46KB

Thu, 11/3/05 9:41 AM 3KB

Thu, 11/3/05 9:35 AM 18KB

Thu, 11/3/05 9:17 AM 15KB

Tue, 11/1/05 12:55 PM 18KB

Tue, 11/1/05 12:14 PM 7KB

Tue, 11/1/05 11:45 AM 46KB

Tue, 11/1/05 10:25 AM 40KB

Mon, 10/31/05 6:37 PM 8KB

Mon, 10/31/05 2:34 PM 3KB

Mon, 10/31/05 10:01 3KB

Mon, 10/31/05 9:04 AM 47KB

Mon, 10/31/05 8:02 AM 13KB

12KB

Re: DBA position

Peter Zhang <peterzhang9999@yahoo.com> To: Timothy Mabbsack <tmabbsack@elevante.com>

(re)015.doc (65KB)

Hi Tim,

+ [] TODAY! WED, 4/23 - WED, 5/14 No events | THU, 5/15 + CapitalOne | FRI, 5/16 - SAT, 5/17 No events

7:59 PM Wednesday 4/23/2008

(2037 unread) Yahoo! Mail, peterzhang9999 - Windows Internet Explorer

File Edit View Favorites Tools Help

☆ (2037 unread) Yahoo! Mail, peterzhang9999

YAHOO! MAIL peterzhang9999 Offline Sign Out, My Account, Mail Classic

Check Mail New Search Mail... Go

Big packages Lovi DISH prices

Inbox (2037) Drafts (124) Sent (5) Spam (5) Empty Trash (51) Empty

Contacts Calendar Notes Add All Feeds Add My Folders Add

Re: Oracle DBA (hello again)

Winter, Stephanie RE: HI Peter!

Johannsen, Jan (Telmark Global) RE: opportunity

Murali RE: Need a Oracle DBA

Wayne Re: Oracle DBA real time replication

arjun@diverselynx.com RE: Please find the requirement details [Oracle DBA]

Schmeiss, Richard RE: Oracle DBA (hello again)

Schmeiss, Richard RE: Oracle DBA (hello again)

Schmeiss, Richard RE: Oracle DBA (hello again)

Dacar, Julie RE: fannie mae personal interview

Winter, Stephanie RE: HI Peter!

Winter, Stephanie RE: HI Peter!

willian_befferz@fanniemae.ct Thanks

Rashmi Bali Re: ORACLE DBA (DE)

John Clark Re: Project in Rochester, NY...are you interested?

Dacar, Julie RE: fannie mae personal interview

Dacar, Julie RE: fannie mae personal interview

Winter, Stephanie RE: HI Peter!

Winter, Stephanie RE: HI Peter!

Re: DBA position

Peter Zhang <peterzhang9999@yahoo.com> To: Timothy Mabbsack <tmabbsack@elevante.com>

(re)015.doc (65KB)

Hi Tim,

+ [] TODAY! WED, 4/23 - WED, 5/14 No events | THU, 5/15 + CapitalOne | FRI, 5/16 - SAT, 5/17 No events

7:59 PM Wednesday 4/23/2008

(2037 unread) Yahoo! Mail, peterzhang9999 - Windows Internet Explorer

File Edit View Favorites Tools Help

(2037 unread) Yahoo! Mail, peterzhang9999

YAHOO! MAIL peterzhang9999 Offline □ Sign Out, My Account, Mail Classic

Check Mail New Home Sent 242 messages

Search Mail... Go

Big packages! View DSN prices

Inbox (2037) Drafts (124) Sent (1) Spam (5) Empty Trash (51) Empty

Contacts Calendar Notepad

All Feeds Add My Folders Add

Re: DBA position

Peter Zhang <peterzhang9999@yahoo.com> To: Timothy Mottard <tmottard@elevante.com>

Re: 1:55/DECSTPRD/OECSTDEV/g for global change

Hi Tim,

Today: WED, 4/23 - WED, 5/14 No events THU, 5/15 - CapitalOne FRI, 5/16 - SAT, 5/17 No events

Internet 100% 8:00 PM Wednesday 4/23/2008

(2037 unread) Yahoo! Mail, peterzhang9999 - Windows Internet Explorer

File Edit View Favorites Tools Help

(2037 unread) Yahoo! Mail, peterzhang9999

YAHOO! MAIL peterzhang9999 Offline □ Sign Out, My Account, Mail Classic

Check Mail New Home Sent 241 messages

Search Mail... Go

Unlimited calls just \$24.99/m

Inbox (2037) Drafts (124) Sent (1) Spam (5) Empty Trash (51) Empty

Contacts Calendar Notepad

All Feeds Add My Folders Add

gabriele.wanaken@cdcorp.co new hire paperwork

Winter, Stephenie RE: HI Peter!

Bolin, Patt RE: CDI pre-employment documents

Sam Moreira RE: Database Administrator (DBA) - Senior - C. Jersey - 1Yr Cor

Petrella, Barbara RE: Rescheduled Interview

mpiselli@deloitte.com Thanks

Shenckik@deloitte.com Thanks

Seregi, Kristi RE: Description

nagaraj@kizazentek.com Date ID: 10117328

Alex Kingsley RE: Job Opportunity-Database Administrator-Open Position-Har

Kanchana Aiyar RE: Oracle DBA

Dacar, Julie I RE: tomorrow's 10am interview

Sam Moreira RE: Database Administrator (DBA) - Senior - C. Jersey - 1Yr Cor

Winter, Stephenie RE: HI Peter!

Gonzales, Joseph RE: Oracle 11i DBA Job Opportunity at TEKsystems in Austin, TX

Winter, Stephenie RE: HI Peter!

errykog@us.ibm.com Thanks

Winter, Stephenie RE: HI Peter!

ing file

Peter Zhang <peterzhang9999@yahoo.com> To: "p2zhang@indirect.com" <p2zhang@indirect.com>

:1:55/DECSTPRD/OECSTDEV/g for global change

Today: WED, 4/23 - WED, 5/14 No events THU, 5/15 - CapitalOne FRI, 5/16 - SAT, 5/17 No events

Internet 100% 8:01 PM Wednesday 4/23/2008